

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JACOB D. MILLER

Criminal No. 25-mj-3059-KAR

**GOVERNMENT’S DETENTION HEARING WITNESS LIST AND EXHIBIT LIST**

The United States of America, by its undersigned attorneys (the “Government”) respectfully submits the instant Witness List and Exhibit List for the detention hearing of the defendant Jacob D. Miller (“Miller” or the “defendant”). The Government reserves the right to modify or supplement these lists at any time prior to the hearing.

The Government expects to call FBI Special Agent Christopher Michalak and to introduce the following exhibits:

| No. | Description  | Offered /<br>Admitted |
|-----|--|-----------------------|
| 1   | Affidavit of FBI Special Agent Derek Boucher in support of search warrants for defendant’s residence, website, email account, person, and mobile phone, April 3, 2025 (redacted) |                       |
| 2   | Affidavit of Special Agent Boucher in support of search warrants for defendant’s residence, website, email account, person, and mobile phone, April 10, 2025                     |                       |
| 3   | FedEx box and contents from Jon Blackert to MP, shipped on June 18, 2023   |                       |

|    |   |  |
|----|---|--|
| 4  | FedEx box and invoice from Jon Blackert to MP, shipped on June 18, 2023 (redacted)  |  |
| 5  | Email from FBI Special Agent Bomb Technician Geoffrey M. Raby to Special Agent Boucher concerning "Black Powder," dated April 10, 2025                              |  |
| 6  | Memorandum to File by MassDEP Tamara Cardona-Marek, Chemicals removal at Miller residence on April 10, 2025, dated April 14, 2025                                   |  |
| 7  | Email from FBI Special Agent Weapons of Mass Destruction Coordinator Josh Canter to SA Boucher dated April 10, 2025 regarding Mass DEP photos, dated April 10, 2025 |  |
| 8  | Email from SA Canter to SA Boucher dated April 10, 25 regarding FBI exit photos on April 8, 2025  |  |
| 9  | List of missing items, circled by Mass DEP  |  |
| 10 | Email from SA Canter to SA Boucher regarding Missing items list, dated April 10, 2025   |  |
| 11 | FD-302 of Interview of MP, dated April 8, 2025  |  |
| 12 | Handwritten notes of interviews of MP, dated April 10, 2025; April 11, 2025; and April 14, 2025.  |  |
| 13 | Handwritten notes of interview of Raymon Miller, April 14, 2025   |  |
| 14 | Search Warrant for rear area of piano in Miller residence, Docket No. 25-mj-3063 (KAR)  |  |
| 15 | Photograph of piano with boxes, April 14, 25  |  |
| 16 | Handwritten notes of interview of MP, dated April 8, 2025   |  |
| 17 | FBI Property Receipt for piano search warrant, dated April 14, 25   |  |

|    |  |  |
|----|--|--|
| 18 | Container labeled explosive antimony allotrope, photographed April 14, 2025  |  |
| 19 | Pipe labeled Rubidium, photographed April 14, 2025   |  |
| 20 | Los Alamos National Laboratory description of Rubidium, dated April 14, 2025   |  |
| 21 | ChemTalk description of Antimony, dated April 14, 2025   |  |
| 22 | National Guard Weapons of Mass Destruction Civil Support Team inventory of items, Miller residence search, April 8, 2025 |  |
| 23 | Items left in Miller residence for MassDEP on April 14, 2025   |  |
| 24 | Email with Environmental Services Inc. Lab pack contents sheet for removal from Miller residence on April 14, 2025       |  |

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

STEVEN BRESLOW  
Digitally signed by STEVEN BRESLOW  
Date: 2025.04.15 11:32:26 -0400  
By: /s/ Steven H. Breslow  
STEVEN H. BRESLOW  
(NY2915247)  
Assistant U.S. Attorney  
300 State Street, Suite 230  
Springfield, MA 01105  
413-785-0330  
[steve.breslow@usdoj.gov](mailto:steve.breslow@usdoj.gov)

Dated: April 15, 2025